

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

*Plaintiffs,*

v.

GREGORY W. ABBOTT, et al.,

*Defendants.*

5:21-cv-0844-XR

Consolidated with

Case No. 5:21-cv-0780-XR

Case No. 5:21-cv-0786-XR

Case No. 5:21-cv-0848-XR

Case No. 5:21-cv-0920-XR

**UNOPPOSED MOTION TO WITHDRAW APPEARANCE OF COUNSEL**

Please take note that, pursuant to Local Court Rule AT-3, Plaintiffs Houston Area Urban League (“HAUL”), et al., file this Motion for Withdrawal of Counsel to withdraw Liliana Zaragoza, admitted *pro hac vice* in this matter on February 14, 2022. Ms. Zaragoza will be departing the NAACP Legal Defense Fund, Inc. (“LDF”) effective May 27, 2022. Plaintiffs HAUL, et al., will continue to be represented by counsel at LDF and co-counsel Reed Smith LLP and The Arc of the United States, Inc. Defendants’ counsels of record do not oppose this motion for withdrawal.

Respectfully submitted by,

NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC., REED  
SMITH LLP, THE ARC OF THE UNITED  
STATES, INC.

/s/ Liliana Zaragoza

Liliana Zaragoza\*

Amir Badat\*

Victor Genecin\*

Kathryn Sadasivan\*

Ciara Sisco\*  
NAACP Legal Defense and  
Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, NY 10006  
Telephone: (212) 965-2200  
Facsimile: (212) 226-7592  
ksadasivan@naacpldf.org  
abadat@naacpldf.org

Georgina Yeomans\*  
R. Gary Spencer\*  
NAACP Legal Defense and  
Educational Fund, Inc.  
700 14th Street NW, Suite 600  
Washington, DC 20005  
Telephone: (202) 682-1300  
Facsimile: (202) 682-1312  
jholmes@naacpldf.org  
gyeomans@naacpldf.org

Kenneth E. Broughton  
Texas Bar No. 03087250  
kbroughton@reedsmith.com

J. Keely Dulaney\*  
Texas Bar No. 24116306  
kdulaney@reedsmith.com

Reed Smith LLP  
811 Main Street, Suite 1700  
Houston, TX 77002-6110  
Telephone: (713) 469-3800  
Facsimile: (713) 469-3899

Sarah M. Cummings  
Texas Bar No. 24094609  
Reed Smith LLP  
2850 N. Harwood Street, Suite 1500  
Dallas, TX 75201  
Telephone: (469) 680-4200  
Facsimile: (469) 680-4299  
scummings@reedsmith.com

Shira Wakschlag\*  
The Arc of the United States, Inc.

1825 K Street, NW, Suite 1200  
Washington, DC 20006  
Telephone: (202) 534-3708  
Facsimile: (202) 534-3731  
Wakschlag@thearc.org

*\* Admitted Pro Hac Vice*

*Counsel for Plaintiffs Houston Area  
Urban League; Delta Sigma Theta  
Sorority, Inc.; The Arc of Texas; and  
Jeffrey Lamar Clemmons*

### **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 27, 2022 and that all counsel of record were served by CM/ECF.

May 27, 2022

/s/ *Liliana Zaragoza*  
Liliana Zaragoza

### **CERTIFICATE OF CONFERENCE**

I certify that I have conferred with counsel for the Defendants about this motion, and they do not oppose the relief requested.

/s/ *Liliana Zaragoza*  
Liliana Zaragoza